

Remarks:

1. Objections and Rejections.

The Office Action objects to claims 1-17, as allegedly containing certain informalities. In view of the foregoing amendments, Applicants respectfully traverse these objections.

The Office Action rejects claims 1, 6, 7, 10, 11, 13-16 under 35 U.S.C. 102(b), as allegedly anticipated by European Patent No. 0,729,206 to Simmons. In addition, the Office Action rejects claim 2 under 35 U.S.C. 103(a), as allegedly rendered obvious by Simmons in view of Applicants' Admitted Prior Art ("AAPA"). The Office Action also rejects claims 3-5, 8, 9, 12 under 35 U.S.C. 103(a), as allegedly rendered obvious by Simmons. Further, the Office Action rejects claim 17 under 35 U.S.C. 103(a), as allegedly rendered obvious by Simmons in view of Patent No. US 6,537,086 B1 to MacMullin. Applicants respectfully traverse.

2. Anticipation Rejections.

Claims 1, 6, 7, 10, 11, and 13-16 stand rejected as allegedly anticipated by Simmons. Each of claims 6, 7, 10, 11, and 13-16 is dependent directly or indirectly from claim 1. "A claim is anticipated if and only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." MPEP 2131. In view of the amendment of claim 1 to include limitations from claims 2-5 and because the Office Action does not allege that claims 2-5 are anticipated by Simmons, the anticipation rejections of these claims 1, 6, 7, 10, 11, and 13-16 based on Simmons now are moot. Therefore, Applicants respectfully request that the Examiner withdraw the anticipation rejections of claims 1, 6-7, 10-11, and 13-16 based on Simmons.

3. Obviousness Rejections.

As noted above, claim 2 stands rejected as allegedly rendered obvious by Simmons in view of AAPA. Claims 3-5, 8, 9, 12 also stand rejected as allegedly rendered obvious by Simmons, and claim 17 stand rejected as allegedly rendered obvious by Simmons in view MacMullin. In order for the Office Action to establish a *prima facie* case of obviousness, at least three criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to those of ordinary skill in the art, to modify the primary reference as proposed by the Office

Action. Second, there must be a reasonable expectation of success. Third, the prior art references must disclose or suggest all of the claim limitations. MPEP 2143. For the reasons set forth below, Applicants maintain that the Office Action fails to establish a *prima facie* case of obviousness with respect to the rejected claims.

a. Claims 3-5.

Claims 3-5 are canceled, without prejudice, and the obviousness rejections to those claims now are moot.

b. Claims 1 and 12.

With respect to amended claims 1 and 12, a connector may be a receptacle connector mounted on a circuit board. Appl'n, Para. [0053]. With respect to the embodiment described in the application, such a receptacle connector may comprise an insulator and a plurality of contact pins held by insulator. The insulator further may comprise a base portion and a plate-like portion. The plate-like portion may extend in second direction (Y), may extend from a top end of the base portion in the third direction (Z), and may include lower and upper surfaces opposite to each other in the third direction (Z). The plate-like portion also may comprise a plurality of grooves formed in the lower surface. Those grooves may extend parallel to each other in the second direction (Y) and may be spaced from each other in the first direction (X), so that a plurality of ridges are formed between the respective neighboring ones of the grooves in the first direction (X). The contact pins may be supported by the base portion and may extend in the second direction (Y) along grooves. The insulator may be provided with a pattern on upper surface e.g., pattern 12a.

With reference to claim 1, the described pattern may comprise a plurality of depressed portions, e.g., depressed portions 16a, and 16b, formed on the upper surface (see Appl'n, **Figs. 11, 12, and 15-20**) or a plurality of raised portions, e.g., raised portions 17a, and 17b, formed on the upper surface (see Appl'n, **Figs. 21-23 and 25-30**), or both. The insulator may be made of anisotropic resin. Each of depressed portions may be positioned to correspond with any one of the ridges, as shown in **Fig. 16**. Each of raised portions may be positioned to correspond with any one of the grooves, as shown in **Fig. 26**. In this configuration, the difference between expansion/contraction coefficients on the upper and lower surfaces of the plate-like portion may be reduced or eliminated, and, therefore, undesirable distortions may be reduced. Appl'n, Para. [0062].

With reference to claim 12, the pattern may comprise at least one raised portion, e.g., raised portion 18a, 18b, 18c, and 18d, which extends in the first direction (X) and has an extent greater in the first direction (X) than in the second direction (Y). See Appl'n, **Figs. 31-42**. The insulator again may be made of anisotropic resin. With this configuration, resin may flow readily and smoothly into a metal mold during injection molding, and, therefore, residual stress may be reduced, so that the occurrence of undesirable distortions may be suppressed. Appl'n, Para. [0074].

Neither Simmons nor MacMullin discloses or suggests a receptacle connector, which is mounted on a circuit board and which comprises an insulator provided with a pattern on an upper surface. Specifically, Simmons appears to describe an input/output electrical connector which mates with a cable connector. See Simmons, Column 6, Lines 26-27; **Fig. 1**. Nevertheless, Simmons's input/output electrical connector 18 is distinguishable from Applicants' receptacle connector, e.g., receptacle connector 10. See Simmons, Column 6, Lines 10-11; **Fig. 1**. Unlike the claimed invention, input/output electrical connector 18 includes the molded insulative housing 20 comprising a base 22 and a keyed housing spline 38 which is an integrally-molded extension from the front of the housing base 22 and which is positioned between the top and bottom base surfaces 24 and 26, respectively. See Simmons, Column 6, Lines 42-54; **Figs. 3-10**. Thus, keyed housing spline 38 does not extend from a top end of the housing base 22. In addition, Simmons neither discloses nor suggests a pattern formed on the upper surface of the plate-like portion, such as any of a plurality of depressed portions, e.g., depressed portions 16a, and 16b; a plurality of raised portions, e.g., raised portions 17a and 17b; and at least one raised portion, e.g., raised portion 18a, 18b, 18c, and 18d. Instead, Simmons's grooves 44 are not positioned to correspond with spline ridges 56, and none of Simmons's tongues 42 appears to be positioned to correspond with terminals 60 Compare Appl'n, Claim 1 (as amended).

c. Claims 2, 8, and 9.

Applicants note that claims 2, 8, and 9 are dependent, directly or indirectly, from claim 1. In view of the foregoing remarks, Applicants maintain that claim 1 is not anticipated by Simmons, and the Office Action has not yet demonstrated that amended claim 1 is rendered obvious by Simmons, alone or in combination with any other reference. "If an independent claim is non-obvious under 35 U.S.C. 103, then any claim dependent therefrom is non obvious." MPEP 2143.03. Because each of the rejections of claims 2, 8, and 9 are predicated on the anticipation rejection of claim 1 based on Simmons, Applicants maintain

that the Office Action has not demonstrated that Simmons, alone or in combination with the other cited references, discloses or suggests all the claim limitations of those rejected claims. In particular with respect to claim 2, the Office Action does not allege that AAPA discloses or suggests those elements of claim 1 which are not disclosed or suggested by Simmons. Thus, the Office Action fails to establish a *prima facie* case for obviousness, and the obviousness rejections of claims 2, 8, and 9 now are untenable. Therefore, Applicants respectfully request that the Examiner withdraw the obviousness rejections of claims 2, 8, and 9 based on Simmons, alone or in combination with MacMullin.

d. Claim 17.

Claim 17 depends indirectly from claim 1. Although MacMullin may describe an electrical connector including a plurality of grounding contacts, each of which has a pair of hollow beams, MacMullin neither discloses nor suggests the receptacle connector, as described in claim 1, including an insulator provided with a pattern on an upper surface of the plate-like portion. Moreover, the Office Action does not demonstrate that the elements of amended claim 1, which are neither disclosed nor suggested by Simmons, are supplied by reference to MacMullin. Thus, the Office Action fails to establish a *prima facie* case for obviousness of claim 1 or 17, and the obviousness rejection of claim 17 now is untenable. Therefore, Applicants respectfully request that the Examiner withdraw the obviousness rejection of claim 17 based on Simmons in combination with MacMullin

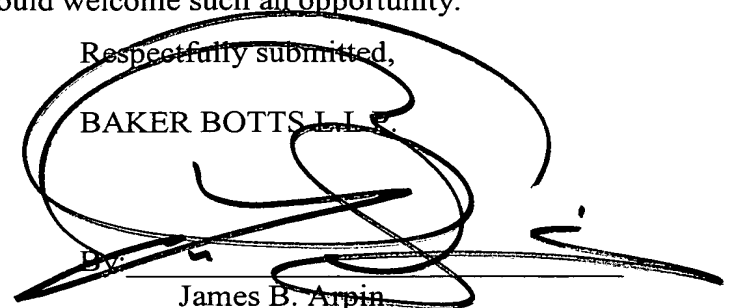
Conclusion:

Applicants respectfully submit that this application, as amended, is in condition for allowance, and such disposition is earnestly solicited. If the Examiner believes

that an interview with Applicants' representatives, either in person or by telephone, would expedite prosecution of this application, we would welcome such an opportunity.

Respectfully submitted,

BAKER BOTTS L.L.P.

A large, stylized handwritten signature in black ink, appearing to be 'J. Arpin', is written over the text 'BAKER BOTTS L.L.P.' and the name 'James B. Arpin'.

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Enclosures

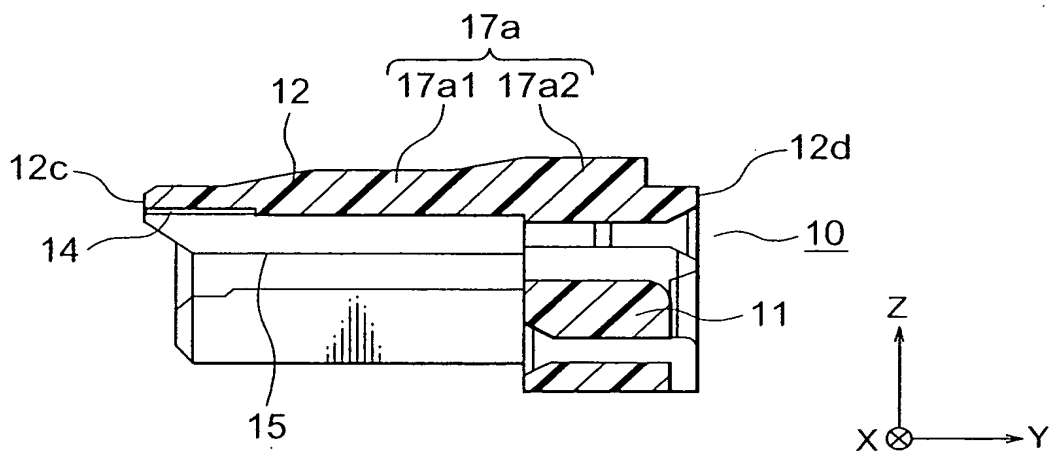
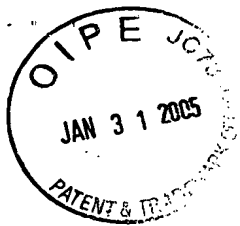


FIG. 27

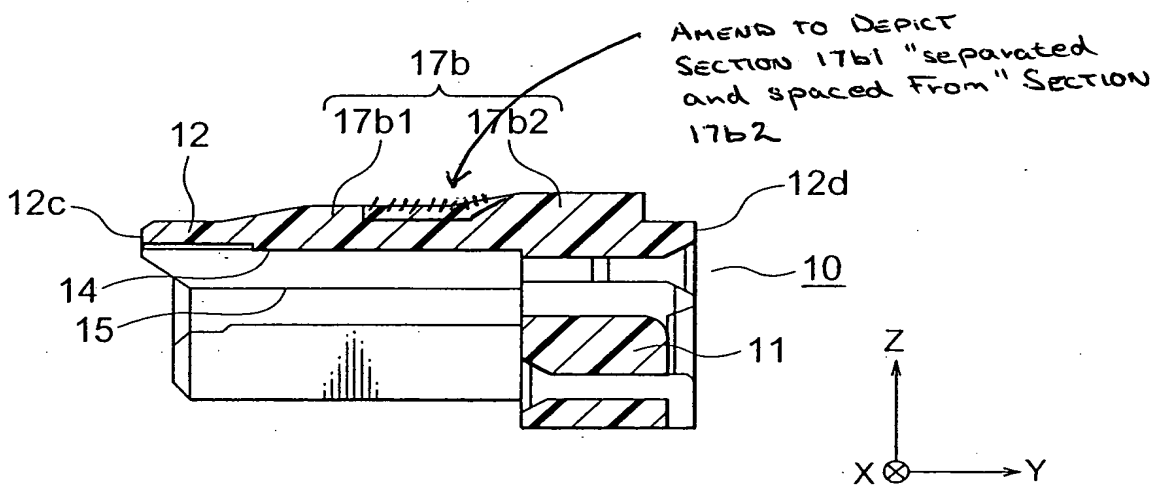


FIG. 28

Amendments to the Drawings:

The attached sheet of drawings includes changes to **Fig. 28**. This sheet, which includes **Fig. 28**, replaces the original sheet including **Fig. 28**. In amended **Fig. 28**, Applicants depict the two sections 17b1 and 17b2, which comprise material raised portions 17b. In accordance with the specification, “the section 17b1 is separated and spaced from the section 17b2 in the Y-direction.” Appl’n, Para. [0071] (emphasis added). Moreover, sections 17b1 and 17b2 depicted in **Fig. 28** are distinguishable over sections 17a1 and 17a2, which constitute “one material-raised portion 17a . . . arranged on a single imaginary line extending in the Y-direction.” Appl’n, Para. [0070].

Attachment: Replacement Sheet

Annotated Sheet Showing Changes (changes shown in red ink)

Request for Reconsideration:

Applicants are amending the specification to correct two typographical errors in Paras. [0057] and [0058] and are amending the drawings to include corrections to **Fig. 28**, so that **Fig. 28** conforms to the description in the application. Applicants also are amending claim 1 to include limitations of claims 2-5 and are cancelling claims 3-5, without prejudice. Further, Applicants are amending claims 1, 2, and 6-17 to clarify the description of the claimed invention and to address the objections to these claims. No new matter is introduced by these amendments and the amendments are fully supported by the specification, as filed. E.g., Appl'n, Para. [0053], [0070], and [0071]. As a result of these amendments, claims 1, 2, and 6-17 are pending in this application. No fees are believed due as a result of these amendments. Nevertheless, in the event of any variance between the fees determined by Applicants and those determined by the PTO, please charge or credit that variance to the undersigned's Deposit Account No. 02-0375. Applicants respectfully request that the Examiner enter these amendments and reconsider this application in view of the foregoing amendments and the following remarks.